



**U.S. Department of Justice**

*United States Attorney  
Southern District of New York*

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*26 Federal Plaza, 37<sup>th</sup> Floor  
New York, New York 10278*

April 4, 2025

The Honorable Arun Subramanian  
United States District Judge  
Southern District of New York  
500 Pearl Street  
New York, NY 10007

**Re:    *United States v. Combs, S3 24 Cr. 542 (AS)***

Dear Judge Subramanian:

The Government respectfully submits this letter regarding the S3 Indictment returned yesterday in the above-referenced case by a Grand Jury sitting in this District (the “S3 Indictment”).

The S3 Indictment contains three substantive changes to the charged offenses. *First*, Count Four charges an additional substantive count of sex trafficking by force, fraud, or coercion, with respect to Victim-2. (*See* S3 Indictment ¶ 19). Victim-2 was previously identified as a victim of sex trafficking in Count One of the S2 Indictment. *Second*, Count One has been amended to include a second special sentencing factor related to the new sex trafficking offense charged in Count Four. (*See id.* ¶ 16). *Third*, the S3 Indictment charges the Mann Act in two separate counts in Counts Three and Five covering conduct for Victim-1 and Victim-2, respectively. (*Id.* ¶¶ 18, 20). The S2 Indictment previously charged this conduct as a single Mann Act offense. In addition, the language of Count One contains two non-substantive changes clarifying that the defendant kidnapped and carried and displayed a firearm to female victim, and that the defendant dangled a female victim over an apartment balcony. (*Id.* ¶ 12(j)).

The Government has already produced all Rule 16 discovery and *Jencks* Act materials in its possession associated with the S3 Indictment and does not expect the S3 Indictment to affect existing pre-trial deadlines. The Government respectfully requests that the defendant be arraigned on the S3 Indictment at the final pre-trial conference scheduled for April 25, 2025.

Respectfully submitted,

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cc: Counsel of record (by ECF)